



Honorable Mike K. Nakagawa
United States Bankruptcy Judge



Entered on Docket
August 03, 2023

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Counsel for Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re
CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-S-23-10423-MKN
Chapter 11

**ORDER GRANTING EIGHTEENTH
OMNIBUS MOTION FOR ENTRY OF ORDER
APPROVING REJECTION OF EXECUTORY
CONTRACTS AND UNEXPIRED LEASES
PURSUANT TO 11 U.S.C. § 365(a) AND
SETTING REJECTION DAMAGES CLAIM
DEADLINE**

Hearing Date: July 27, 2023
Hearing Time: 1:30 p.m.

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The Court having reviewed and considered Debtor's motion [ECF 759] (the "Motion")¹ for an order approving the rejection of Contracts and/or Leases pursuant to 11 U.S.C. § 365(a); and upon consideration of the Ayala Declaration and arguments of counsel; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and it appearing that no other or further notice need be provided; the Court having determined that the rejection of the Contracts and/or Leases is a sound exercise of the Debtor's business judgment and is in the best interests of Debtor, its creditors and all other parties in interest; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor, it is hereby,

ORDERED that the Motion is **GRANTED** with respect to the Contracts and/or Leases as set forth in **Exhibit 1**; and it is further

ORDERED that the Debtor's rejection of the Contracts and/or Leases, attached hereto as **Exhibit 1**, pursuant to 11 U.S.C. § 365(a) is approved effective as of the date of the filing of the Motion; and it is further

ORDERED that all persons and entities listed on **Exhibit 1** that assert any claims against Debtor for damages arising from the rejection of their leases listed on **Exhibit 1** (a "Rejection Damages Claim") must file a Proof of Claim with the Clerk of the Bankruptcy Court for such Rejection Damages Claim **no later than thirty (30) days after entry of this Order** or shall be forever barred from asserting such Rejection Damages Claim; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation or interpretation of this Order; and it is further

ORDERED that notice of the Motion as provided therein shall be deemed good and sufficient notice of the Motion.

¹ Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Motion.

Prepared And Respectfully Submitted By:

FOX ROTHSCHILD LLP

By: /s/ Jeanette E. McPherson

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Las Vegas, Nevada 89135

Counsel for Debtor

APPROVED/DISAPPROVED

MCDONALD CARANO LLP

By: /s/ Catherine V. Lotempio

RYAN J. WORKS, ESQ. (NSBN 9224)
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and

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CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 9021

In accordance with Local Rule 9021, counsel submitting this document certifies as follows:

- ☒ The Court has waived the requirement of approval in LR 9021(b)(1).
- ☐ No party appeared at the hearing or filed an objection to the motion.
- ☐ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated above.
- ☐ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

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EXHIBIT 1
CONTRACTS AND/OR LEASES TO BE REJECTED

FOX ROTHSCHILD LLP
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
(702) 262-6899
(702) 597-5503 (fax)

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Counterparty	Counterparty Address	Description
AgileSouth LLC	625 N University Dr Pembroke Pines, FL 33024	Master Service Agreement
Alteryx	Attn: Amanda Martin 3345 Michelson Drive Irvine, CA 92612	Service Agreement
American Deposit Management, LLC	Attn: Kelly A. Brown or Robert Zondag W220 N3451 Springdale Road Pewaukee, WI 53072	Deposit Account Agency Agreement
Bancsource	Attn: Donna Williams 3130 South Delaware Springfield, MO 65804	Service Agreement
BitAccess, Inc.	Attn: Moe Adham 267 Richmond Rd. Ottawa ON K1Z 6X3 Canada	Loan Agreement
BitAccess, Inc.	Attn: Moe Adham 267 Richmond Rd. Ottawa ON K1Z 6X3 Canada	Amendment to Master Purchase Agreement
BitAccess, Inc.	Attn: Moe Adham 80 Aberdeen St Ottawa ON K1S 3J5 Canada	Master Purchase Agreement
BitAccess, Inc.	Attn: Moe Adham 80 Aberdeen St Ottawa ON K1S 3J5 Canada	Service Level Agreement
Black Hole Investments LLC f/k/a EZ Coin LLC	Attn: Zachary Chaltiel & Edouard Chaltiel 480 NW Albemarle Ter Portland, OR 97210	Tolling Agreement
Brandon Arner	2745 Trotood Lane Las Vegas, NV 89108	Cash Cloud Services Agreement
Business Technology Partners, LLP.	1751 Lake Cook Road, Suite 400 Deerfield, IL 60015	Agreement
Calebe Rossa	1025 Aspen Lane Mansfield, TX 76063	Service Agreement
Caravel Partners LLC	795 Folsom Street, 1st Floor San Francisco, CA 94107	Agreement
Cennox	Attn: Lauren Wajzman 1015 Windward Ridge Pkwy Alpharetta, GA 30005	
Cheq Technologies Inc	450 Park Ave S New York, NY 10016	Agreement
Clay Global, LLC	Attn: Anton Zykin 300 Broadway San Francisco, CA 94133	Service Agreement
Competitive Media Reporting, LLC d/b/a Kantar Media Intelligence	3 World Trade Center New York, NY 10007	License Agreement
Consult HR Partners, LLC	Attn: Jennifer Martinez 3230 Southgate Cir #123 Sarasota, FL 34239	HR Service Agreement

Counterparty	Counterparty Address	Description
Converz Media Group LLC	17011 Beach Blvd Huntington Beach, CA 92647	Advertising Agreement
Craig Jones	Unit C, Callejon J Bato St Gagalangin Tondo Metro Manila 1013 Philippines	Coin Cloud Service Agreement
Cruview LLC dba Marketrade	Attn: John C Nicholson 4701 Sangamore Road Bethesda, MD 20816	Agreement/Statement of Work
CRYPTIO	101, rue de Sèvres – 75006 Paris France	SAAS License Agreement
Elliptic Inc.	1732 1st Ave #23346 New York, NY 10128	Elliptic US Engagement Letter
Environmental Systems Research Institute, Inc.	Attn: Shannon Robertson 380 New York Street Redlands, CA 92373-8118	Service Agreement
Escalate Communications LLC	1501 San Elijo Road South, #104-307 San Marcos, CA 92078	Retainer Consulting Agreement
EZ Coin LLC	5580 S Fort Apache Rd Las Vegas, NV 89147	Services Agreement
FalconX Limited	Attn: Ana De Sousa Level G, Office 1/1191 Ta' Xbiex XBX 1120 Malta	Crypto Trading Agreement
Fireblocks, Inc.	221 River Street, 9th Floor Hoboken, NJ 07030	Fireblocks License Agreement
Geographic Information Services, Inc.	Attn: Stephanie Lindley 2100 Rivershase Center Birmingham, AL 35244	Service Agreement
Granite Mobility	100 Newport Ave Ext. Quincy, MA 02171	Coin Cloud-Granite Partnership Agreement
JMF Facets, LLC	c/o Jewelers Mutual Group 24 Jewelers Park Dr Neenah, WI 54956	Services Agreement
KIOSK Information Systems, Inc.	Attn: Joe Sawicki, Jenni Pitton & Kim Kenney 346 S. Arthur Ave Louisville, CO 80027	Software service agreement
Lo Flo LLC	Attn: Luis Flores-Monroy 3275 South Jones Blvd., Suite 105 Las Vegas, NV 89146	Lo Flo LLC Services Agreement for Coin Cloud
Lola Tech Limited	Attn: Nick Boni 1 Mark Square London EC2A 4EG United Kingdom	Services Agreement
LucaNet (North America) LLC	Attn: Dominik Duchon 1900 Market Street Philadelphia, PA 19103	Service Agreement
Michael Tomlinson	89 Vista Rafael Pkwy. Reno, NV 89503	Employment Agreement
Michael Tomlinson	89 Vista Rafael Pkwy. Reno, NV 89503	Loan Agreement
Mix Panel	One Front Street, 28th Floor San Francisco, CA 94111	Agreement

EXHIBIT 1 TO ORDER – EIGHTEENTH OMNIBUS REJECTION MOTION

Counterparty	Counterparty Address	Description
MomentFeed, Inc.	14005 Live Oak Ave Irwindale, CA 91706	Master Services Agreement
MomentFeed, Inc.	3415 S. Sepulveda Blvd, Suite 1100 Los Angeles, CA 90034	Partnership Agreement
MomentFeed, Inc.	3415 S. Sepulveda Blvd, Suite 1100 Los Angeles, CA 90034	Master Services Agreement
National Services, LLC	Attn: Stefanie Farmer & Dean Smith 315 Trane Dr Knoxville, TN 37919	Service Agreement
Netlify, Inc.	2343 3rd Street #296 San Francisco, CA 94107	Master Services Agreement
OptConnect Management LLC	Attn: Chris Baird 865 W 450 N, Suite 1 Kaysville, UT 84037	Master Products and Services Agreement
Pelican Communications, Inc.	Attn: Richard Scherer 67 Front Street Danville, CA 94526	Master Marketing Agreement
PeopleWare Staffing, Inc.	Attn: Sheryl Rooker 302 W Grand Ave #4 El Segundo, CA 90245	Full Time Placement Agreement
Perry Leon	1217 Horn Avenue, Suite 103 Los Angeles, CA 90069	Partially Executed Service Agreement
Prize Logic, LLC	25200 Telegraph Rd Southfield, MI 48033	Master Services Agreement
Robert Parker Mundo	2455 W Serene Ave, Apt 3-723 Las Vegas, NV 89123	Property Agreement
SafeGraph, Inc.	1624 Market St Ste 226, #53755 Denver, CO 80202	Master Data License Agreement
Scandit Inc	Attn: Austin Tittle 711 Atlantic Ave 5th Floor Boston, MA 02111	Agreement
Socure, Inc.	Mountain Workspace, 885 Tahoe Blvd, Suite 11 Incline Village, NV 89451	Master Services Agreement
Spanner Product Development	Attn: Giles Lowe 15 W San Fernando St San Jose, CA 95113	Agreement
Sygnia	Attn: Oren Wortman 94a Yigal Alon St. Tel Aviv 6789155 Israel	Services Agreement
Talon.One Inc	One Boston Place, Suite 2600 Boston, MA #02108	Master SAAS Agreement
Tatro Management LLC	Attn: Keith Tetrault 4256 Pinetree Lane Cincinnati, OH 45245	Finders Fee Agreement
Tecniflex, LLC. dba Bancsource	3130 South Delaware Springfield, MO 65804	ATM Liability agreement
UAB Simplex Payment Services	AB Nuvei, Lvivo g. 37-101 LT-09307 Vilnius Lithuania	Partner Agreement for Referrals
Unit21 Inc.	343 Sansome St. Ste 1600 San Francisco, CA 94104	Master Services Agreement

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Counterparty	Counterparty Address	Description
Verizon Wireless	Attn: Correspondence Team P.O. Box 15069 Albany, NY 12212	Wireless Service - Acct No. 342307585-00001
Verizon Wireless	Attn: Correspondence Team P.O. Box 15069 Albany, NY 12212	Wireless Service - Acct No. 342307585-00002
Virginia Varela	6151 Fordham Way Sacramento, CA 95831	Client Service Agreement - Virginia Varela
Vision IT Consulting, Inc.	Attn: Blanca Ramos 187 E Warm Springs Rd Las Vegas, NV 89119	Software Development Agreement
Vision IT Consulting, Inc.	Attn: Blanca Ramos 187 E Warm Springs Rd Las Vegas, NV 89119	Software Maintenance and Support Agreement
Vision IT Consulting, Inc.	Attn: Blanca Ramos 187 E Warm Springs Rd Las Vegas, NV 89119	Software Development Agreement
Vision IT Consulting, Inc.	Anillo Vial III 174-1, Col. Saldarriaga Carlos Salinas de Gortari, Qro. 76267 Mexico	Software Development Agreement
Woodforest National Bank	1213 E. Trinity Mills Road Carrollton, TX 75006	Electronic Funds Transfer Agreement
Wyre Payments, Inc.	1550 Bryant St. San Francisco, CA 94103	Wyre Referral Agreement
Zero Hash LLC	327 N Aberdeen St # 210 Chicago, IL 60607	Platform Operator Agreement